

**UNITED STATES DISTRICT COURT
DISTRICT OF NEW JERSEY**

IN RE: LIQUID ALUMINUM SULFATE
ANTITRUST LITIGATION

Civil Action No. 16-md-2687 (JLL) (JAD)

NOTICE OF MOTION

To: All Counsel on ECF Service List

COUNSEL:

PLEASE TAKE NOTICE that on such date and time as the Court shall designate, the undersigned counsel for Indirect Purchaser Class Plaintiffs pursuant to this Motion For Preliminary Approval of Settlement and Certification of Settlement Class shall move before the Honorable Jose L. Linares, U.S.D.J. at the Martin Luther King, Jr. Building & U.S. Courthouse, 50 Walnut Street, Newark, New Jersey for an Order: (1) granting preliminary approval of the IPP Settlement; (2) certifying the proposed Indirect Purchaser Settlement Class; (3) appointing named Plaintiffs City of Homestead, Florida (“Homestead”) and City of Creston Water Works Department (“Creston”) as class representatives of the Indirect Purchaser Settlement Class; (4) appointing Interim IPP Lead Counsel as co-lead class counsel for the Indirect Purchaser Settlement Class; (5) approving the form of notice and plan of notice to the Indirect Purchaser Settlement Class; (6) appointing the proposed settlement administrator; and (7) entering an appropriate case management schedule.

In support of this motion, the undersigned intends to rely the following documents attached hereto: (1) full and complete copy of the settlement agreement between Indirect Purchaser Class Plaintiffs and Defendants GEO Specialty Chemicals, Inc., Kenneth A. Ghazey and Brian C. Steppig; (2) supporting memorandum of law, (3) joint declaration of Marvin A. Miller and Jay B. Shapiro, (4) declaration of Linda V. Young; and (5) proposed order.

The undersigned hereby requests oral argument.

Dated: June 29, 2018

Respectfully submitted,

Indirect Purchaser Plaintiffs

s/ *Marvin A. Miller*

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CERTIFICATE OF SERVICE

I hereby certify that on June 29, 2018, I caused the foregoing to be filed electronically via the Court's CM/ECF system, which will send electronic notification of filing to the registered participants as identified on the Notice of Electronic Filing (NEF). The foregoing document is also available for viewing and downloading from the ECF system.

s/ Marvin A. Miller

Marvin A. Miller